

Hearing Date: September 30, 2020 at 10:00 a.m. (ET)
Objection Deadline: September 23, 2020 at 4:00 p.m. (ET)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re

PURDUE PHARMA L.P., et al.,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

Administratively Consolidated

NOTICE OF INDEPENDENT EMERGENCY ROOM PHYSICIAN’S MOTION [1629]
PURSUANT TO FED. BANKR. P.
9014 AND 7023 FOR AN ORDER MAKING FED. R. CIV. P. 23 APPLICABLE TO
THESE PROCEEDINGS, PERMITTING THEM TO FILE A CLASS PROOF OF
CLAIM AND GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that on August 27, 2020, the IndependentER Physician’s,² on behalf of themselves and a proposed class of similarly situated persons, by and through their undersigned counsel, filed a motion [1629] pursuant to Fed. R. Bankr. P. 9014 and 7023 for the entry of an order making Fed. R. Civ. P. 23 applicable to the “ER Physician’s Proof of Claim” (the “Class Proof of Claim”), permitting them to file the Class Proof of Claim and granting related relief (the “Motion”). A hearing on the Motion [1629] will be held on **September 30, 2020, at 10:00 a.m.** (prevailing Eastern Time) before the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York,

¹The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014).

²As used herein, the “Independent ER Physicians” or “ER Physicians” are: Michael Masiowski, M.D. and all other similarly situated. Independent emergency room physicians refer to those emergency room physicians whose billing and revenue collection were entirely separate from the medical facility billing practices. I was an owner and member of a group of emergency room physicians that were not employees of the hospital and performed our own billing and revenue collection.

at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 (the “Bankruptcy Court”), or at such other time as the Bankruptcy Court may determine.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted pro hac vice, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with the *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures* entered on November 18, 2019 [ECF No. 498], so as to be filed and received no later than **September 23, 2020 at 4:00 p.m.** (prevailing Eastern Time) (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served, the Independent ER Physicians may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that, pursuant to General Order M-543, dated March 20, 2020 (Morris, C.J.) (“General Order M-543”), such Hearing shall be conducted telephonically so long as General Order M-543 is in effect on the day of the hearing or unless otherwise ordered by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE, that any hearing conducted by telephone shall be conducted pursuant to Judge Drain's guidelines for telephonic appearances and may require registration with Court Solutions LLC. Judge Drain's guidelines may be found at

<http://www.nysb.uscourts.gov/content/judge-drains-chambers-rules>. You may reach Court

Solutions by telephone at (917) 746-7476 or online at www.court-solutions.com. You need not appear at the hearing if you do not object to the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE that the Motion was electronically filed with the Bankruptcy Court. Copies of the Motion cases may be obtained free of charge by visiting the website of Prime Clerk at <https://restructuring.primeclerk.com/purduepharma>.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the hearing and a failure to appear may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates in open court at the Hearing.

DATED: September 1, 2020

Respectfully submitted,

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/s/ Paul S. Rothstein

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